

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2012 DEC -4 PM 1:50

DEPUTY CLERK N

UNITED STATES OF AMERICA

VS.

BARRETT LANCASTER BROWN (1)

§
§
§
§
§

NO.

3 - 12CR - 413 - B

The Grand Jury charges:

INDICTMENT

Count One

Traffic in Stolen Authentication Features
(18 U.S.C. §§ 1028(a)(2), (b)(1)(B), and (c)(3)(A))
Aid and Abet
(18 U.S.C. § 2)

On or about December 25, 2011, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, in and affecting interstate commerce, did knowingly traffic in more than five authentication features knowing that such features were stolen and produced without lawful authority, in that **Brown** transferred the hyperlink "http://wikisend.com/download/597646/stratfor_full_b.txt.gz" from the Internet Relay Chat (IRC) channel called "#Anonops" to an IRC channel under **Brown**'s control called "#ProjectPM," said hyperlink provided access to data stolen from the company Stratfor Global Intelligence, to include in excess of 5,000 credit card account numbers,

the card holders' identification information, and the authentication features for the credit cards known as the Card Verification Values (CVV), and by transferring and posting the hyperlink, **Brown** caused the data to be made available to other persons online without the knowledge and authorization of Stratfor Global Intelligence and the card holders.

In violation of 18 U.S.C. §§ 2 and 1028(a)(2), (b)(1)(B), and (c)(3)(A).

Count Two
Access Device Fraud
(18 U.S.C. §§ 1029(a)(3) and (c)(1)(A)(i))
Aid and Abet
(18 U.S.C. § 2)

From on or about December 25, 2011, through at least on or about March 6, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, with intent to defraud did possess at least fifteen and more devices unauthorized access devices in and affecting interstate and foreign commerce, in that **Brown** possessed stolen credit card account numbers and the authentication features for the credit cards known as the Card Verification Values (CVV) without the knowledge and authorization of the card holders.

In violation of 18 U.S.C. §§ 2 and 1029(a)(3), and (c)(1)(A)(i).

Counts Two Through Twelve

Aggravated Identity Theft
 (18 U.S.C. §§ 1028A(a)(1))
 Aid and Abet
 (18 U.S.C. § 2)

From on or about December 25, 2011 through at least on or about March 6, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, during and in relation to a felony violation of 18 U.S.C. § 1028(a)(2), knowingly transferred and possessed without lawful authority the means of identification of the persons below referenced, said means of identification consisting of the credit card account numbers; the corresponding authentication features for the credit cards known as the Card Verification Values (CVV); the card holders' names and usernames for online account access; and the card holders' physical addresses, phone numbers, and email addresses.


COUNT	CARD HOLDER	CITY, STATE	AMERICAN EXPRESS CC # (last four digits)	CC CVV (redacted)
3	BM	Houston, TX	5003	4*87
4	CD	Dallas, TX	4011	9*71
5	BH	Spicewood, TX	1007	4*28
6	BL	Galveston, TX	2004	4*20
7	BS	Dallas, TX	1009	8*55
8	BC	Dallas, TX	3009	4*10

9	BW	Dallas, TX	2732	7*16
10	MT	Coco Beach, FL	4007	9*98

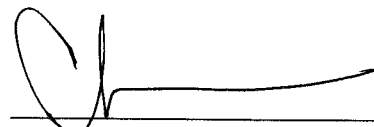
COUNT	CARD HOLDER	CITY, STATE	MASTER CARD CC # (last four digits)	CC CVV (redacted)
11	KR	Tucson, AZ	6394	4*8
12	BJ	Richardson, TX	6444	4*3

In violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

A TRUE BILL:


FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY


CANDINA S. HEATH
Assistant United States Attorney
Northern District of Texas
State of Texas Bar No. 09347450
1100 Commerce Street, 3rd Floor
Dallas, Texas 75242
office: 214.659.8600
fax: 214.659.8805
candina.heath@usdoj.gov

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FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

BARRETT LANCASTER BROWN (1)

INDICTMENT

18 U.S.C. §§ 1028(a)(2), (b)(1)(B), and (c)(3)(A); 18 U.S.C. § 2
Traffic in Stolen Authentication Features; and Aid and Abet

18 U.S.C. §§ 1029(a)(3) and (c)(1)(A)(i); and 18 U.S.C. § 2
Access Device Fraud; and Aid and Abet

18 U.S.C. §§ 1028A(a)(1); and 18 U.S.C. § 2
Aggravated Identity Theft; and Aid and Abet

12 Counts

A true bill rendered

DALLAS

Andrew L. Fuggle
FOREPERSON

Filed in open court this 4 day of December, 2012

Clerk

Defendant already in Federal Custody since 9/13/12 at Mansfield

UNITED STATES DISTRICT MAGISTRATE JUDGE

Magistrate Case pending 3:12-MJ-405